

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

INTERNATIONAL ACADEMIC CITY,)
and SAQI BARZANI,)

Plaintiffs,)

v.)

Civil Action No. 1:20-cv-193

STRATFORD UNIVERSITY, INC.)
and RICHARD SHURTZ,)

Defendants.)

MOTION TO DISMISS

Defendants Stratford University, Inc. (“Stratford” or the “University”) and Richard Shurtz (collectively, “Defendants”), by counsel, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, move the Court for entry of an Order dismissing Counts II, III, IV and V of the Second Amended Complaint filed by plaintiffs International Academic City (“IAC”) and Saqi Barzani (collectively, “Plaintiffs”) for failure to state a claim upon which relief can be granted. The further grounds and bases for this motion are set forth in the accompanying Memorandum in Support of the Motion to Dismiss.

WHEREFORE, Defendants respectfully request that this Court grant their motion and dismiss Counts II, III, IV, and V of the Second Amended Complaint with prejudice.

Respectfully re-submitted this 5th day of June 2020.

**STRATFORD UNIVERSITY, INC. and
RICHARD SHURTZ**

By: /s/ Justin S. Feinman
Harold E. Johnson (VSB No. 65591)
Justin S. Feinman (VSB No. 87511)
WILLIAMS MULLEN, P.C.

200 South 10th Street, 16th Floor
Richmond, Virginia 23219
(804) 420-6000
(804) 420-6507 (facsimile)
hjohnson@williamsmullen.com
jfeinman@williamsmullen.com
Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify on June 5, 2020 that a copy of the foregoing was electronically re-filed with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing as follows:

Stephen J. Stine, Esq. (VSB No. 66738)
The Stine Law Firm PLLC
3900 Jermantown Road, Suite 300
Fairfax, Virginia 22030
(703) 201-5075
(703) 647-6009 (facsimile)
stine@stinelaw.com
Counsel for Plaintiffs

By: /s/ Justin S. Feinman
Justin S. Feinman (VSB No. 87511)
WILLIAMS MULLEN, P.C.